Transcript of the Testimony of

John Horan

March 05, 2020

JOHN HORAN, et al. vs UNIVERSITY HOSPITALS HEALTH SYSTEM, INC., et al.



Cleveland Reporting Partners, LLC

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1			
1	IN THE UNITED STATES DISTRICT COURT		
2	FOR THE NORTHERN DISTRICT OF OHIO		
3	EASTERN DIVISION		
4	~~~~~~~~~~~		
5			
6	JOHN HORAN, et al.,		
7	Plaintiffs,		
8	vs. Case No. 1:18-CV-02054		
9			
10	UNIVERSITY HOSPITALS HEALTH SYSTEM, INC., et al.,		
11	Defendants.		
12			
13	~~~~~~~~~~~		
14	Deposition of		
15	JOHN HORAN		
16	Manager F. 2000		
17	March 5, 2020 9:00 a.m.		
18	Location:		
19	Liner Legal, LLC 4269 Pearl Road, Suite 104		
20	Cleveland, Ohio		
21	Todd L. Persson, Notary Public		
22			
23			
24			
25			

		Page 2	
1	APPEARANCES:		
2			
3	On behalf of the Plaintiffs:		
4	ANDREW NOVEMBER, ESQ.		
5	Liner Legal, LLC		
6	4269 Pearl Road		
7	Suite 104		
8	Cleveland, OH 44109		
9	(216) 282-1773		
10	anovember@linerlegal.com		
11			
12	On behalf of the Defendants:		
13	DAVID A. CAMPBELL, ESQ.		
14	Lewis Brisbois Bisgaard & Smith, LLP		
15	1375 E. 9th Street		
16	Suite 2250		
17	Cleveland, OH 44114		
18	(216) 298-1262		
19	david.a.campbell@lewisbrisbois.com		
20	~ ~ ~ ~		
21	ALSO PRESENT:		
22	Charles Imperatore, Certified ASL		
23	Interpreter		
24	~ ~ ~ ~		
25			

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1	Page 4 (Thereupon, Charles Imperatore, Certified
2	ASL Interpreter, was sworn.)
3	JOHN HORAN, of lawful age, called for
4	examination, as provided by the Federal Rules of
5	Civil Procedure, being by me first duly sworn, as
6	hereinafter certified, deposed and said as
7	follows:
8	EXAMINATION OF JOHN HORAN
9	BY MR. CAMPBELL:
10	ANSWERS THROUGH INTERPRETER:
11	Q. Good morning. I'm David Campbell. I'm
12	here to ask you some questions about the lawsuit
13	that you filed against University Hospitals.
14	A. Yes.
15	Q. Could you please state your name for the
16	record?
17	A. John, J-O-H-N, Horan, H-O-R-A-N.
18	Q. And what is your current address?
19	A. 6853 Talbot, T-A-L-B-O-T, Drive, Parma,
20	Ohio 44129.
21	Q. Who resides there with you?
22	A. My wife.
23	Q. And is her name Antoinette?
24	A. It's just the two of us. That's correct.
25	Q. Have you ever been through a deposition

1	like th	Page 5
2	Α.	No.
3	Q.	I'm sure your counsel has given you
4	instruc	tions?
5	A.	Yes.
6	Q.	And here are my instructions. If you
7	need a	break at any point, just let us know, okay?
8	A.	Yes. I understand.
9	Q.	If you don't understand one of my
10	questio	ns, just let the interpreter know.
11	Α.	Okay. I understand that.
12	Q.	And if you need to have me repeat
13	somethi	ng or explain something, just let the
14	interpr	eter know.
15	Α.	Okay. I understand.
16	Q.	Do you have a hearing impairment?
17	Α.	Yes. I was born deaf.
18	Q.	Did you graduate from high school?
19	А.	No. No. I only went through the 7th
20	grade.	My father forced me to leave school.
21	Q.	Have you had any schooling since high
22	school?	
23	Α.	No. I went to work after school. I
24	worked	after 7th grade.
25	Q.	When is the last time that you held a

1	job?	Page 6
2	Α.	I worked at the Post Office
3	Q.	And when did you retire?
4	Α.	for 30 years. 1999 I retired.
5	Q.	Do you have any children?
6	Α.	Yes. I have two children. Two sons.
7	Q.	Is one of them John?
8	Α.	Yes. John. John II.
9	Q.	And who's your other son?
10	Α.	John, and then there's Thomas.
11	Q.	Does John II live in the Cleveland area?
12	Α.	He lives in Pennsylvania, and he's a
13		_
		He's a college student there.
14	Q.	What school?
15	Α.	It's in Pennsylvania. He's studying to
16	get a Ph	.D., but
17	Q.	Okay. Does he have a hearing impairment?
18	Α.	No. He's hearing.
19	Q.	Does
20	A.	Both of my sons are hearing.
21	Q.	Okay. Does Thomas live in the Cleveland
22	area?	
23	A.	No. He lives in Columbus.
24	Q.	Do you have insurance through your
25	employmen	nt with the Post Office, your former

	Page 7
1	employment?
2	A. Oh, yes. Yes, I do. I've had it
3	yeah, I've had it.
4	Q. And does that let you choose does your
5	health insurance let you choose the hospital or
6	the doctor that you would like to visit?
7	A. Yes. I can do that. Yes. My insurance
8	has been with the Post Office, and I'm allowed to
9	do that, yes.
10	Q. Your wife as well?
11	A. Yes. My wife, yes.
12	Q. Can you read lips?
13	A. A little bit.
14	Q. Can you speak a little English?
15	A. Yes. Yes. I can speak some English.
16	Q. Can you communicate through written
17	notes?
18	A. Yes, I can. Yes. I can do that.
19	Q. Do you use any type of computer devices
20	to communicate through notes?
21	A. No. My wife does, though.
22	Q. Do you have a videophone?
23	A. Yes.
24	Q. Do you use it?
25	A. Yes.

	Page 8
1	Q. Does your wife use the videophone as
2	well?
3	A. Yes.
4	Q. Can you read and write English?
5	A. Yes.
6	Q. Can your wife?
7	A. Of course I can. Of course I can. My
8	wife, no. She's of Arabic she understands and
9	uses Arabic.
10	Q. How do you communicate with your wife?
11	A. We sign. We sign together. But written
12	communication doesn't work between us. It's sign
13	language.
14	Q. How did you communicate when you were
15	working for the Post Office for 30 years with your
16	co-workers?
17	A. I write. Well, before I worked for the
18	Post Office, I was a carpenter.
19	Q. How did you communicate with your Post
20	Office employees over your employment?
21	A. We communicated, yeah. We communicated.
22	Wrote notes. Some gesturing. I didn't have any
23	problems there at the Post Office as a deaf
24	person.
25	Q. How do you communicate if you were going

	John Horan on 03/05/2020
1	Page 9 to go to the grocery store today?
2	A. Well, I don't really bother doing that.
3	I don't go to the grocery store. I don't do that.
4	Q. Does your wife?
5	A. Yes.
6	Q. How would she go about purchasing what
7	she needs to purchase?
8	A. My wife understands you know, she can
9	look at things and read some things and understand
10	and get what she needs.
11	Q. Can she read English?
12	A. No.
13	Q. Who is your current family physician?
14	A. Oh, boy. It's I have a bad memory.
15	You have to ask my wife that.
16	Q. Have you ever seen Dr. Selah at UH?
17	A. Oh, right. Yes. Yes. Yeah, Dr. Selah,
18	yes.
19	Q. Is he still
20	A. That's cardiology, for my heart. That's
21	different. That's only for my heart, yes. The
22	doctor said my heart is so good I'm going to live
23	til 100 years old. After the surgery, after my
24	surgery that was.
25	Q. When did you have the surgery?

1	Page 10 A. You have to ask I forget. You have to
2	ask my wife.
3	Q. Did you have the surgery
4	A. About four years ago.
5	Q at University Hospitals?
6	A. Yes. Plus, I had nine hip surgeries as
7	well.
8	Q. At University Hospitals?
9	A. No. One in Lakewood, one in Cleveland,
10	one in Parma. Parma Hospital.
11	THE INTERPRETER: The interpreter is
12	asking for a clarification.
13	A. The first was Lakewood. The first
14	surgery was Lakewood. Everything went very well.
15	And then the Cleveland Clinic was the second
16	place, and then Parma Hospital was the third.
17	Q. When is the last time you've been at a
18	University Hospital facility?
19	A. It was Parma Hospital yesterday.
20	Q. Was that a regular appointment, or was
21	that the emergency room?
22	A. It was a regular appointment.
23	Q. Who did you see?
24	A. Desli.
25	Q. Can you help us with the spelling?

ſ			
1	A.	I think it's D-E-S D-E-S-L	Page 11
2		THE INTERPRETER: The interpreter is	
3	asking fo	or clarification.	
4	A.	D-E-S-L-I.	
5	Q.	I just could you tell us just in	
6	general;	was it a family physician, was it for a	
7	certain a	ailment that you visited?	
8	A.	For my heart. Cardiology.	
9	Q.	Just a checkup?	
10	A.	Yesterday. It was yesterday.	
11	Q.	Do you see Dr. Desli on a regular basis	
12	for your	heart checkups?	
13	A.	My arms feel wet.	
14		So yesterday yeah, it's every three	
15	months.		
16	Q.	Is Dr. Desli a male or a female?	
17	A.	Male.	
18	Q.	Has he been a good doctor?	
19	A.	He's pretty good, yeah.	
20	Q.	Any issues with Dr. Desli?	
21	A.	Before it was Dr Dr. Tim, the last	
22	name is (Gallagher. And he retired, and so now I	'm
23	seeing D	r. Desli.	
24	Q.	Any problems with Dr. Desli, or do you	
25	like him	?	

		32020
1	Α.	No, he's good. He's okay.
2	Q.	Did you like Dr. Gallagher?
3	A.	Yes. I was with him for 20 years, and
4	now he's	retired.
5	Q.	How long have you been with Dr. Desli?
6	Α.	Two years. Three years, maybe. Two or
7	three yea	ars.
8	Q.	And why did you see Dr. Selah?
9	Α.	Dr. Selah, for my heart.
10	Q.	Did your wife see Dr. Selah as well?
11	Α.	No.
12	Q.	Did you like Dr. Selah?
13	Α.	He's okay. He's okay.
14	Q.	Was he helpful?
15	Α.	Yeah. He would check me out, and I would
16	say yes,	he was helpful. He was from his face,
17	he looked	d like he may have been either Indian or
18	Pakistan	i. He's a nice, nice person.
19	Q.	Have you had any problems with any of the
20	Universit	ty Hospital doctors?
21	A.	My family doctor now is getting back
22	to that,	K oh, it starts with a K-I it's a
23	female do	octor is my family doctor.
24	Q.	Does your wife see her as well?
25	A.	Yes.

Page 13 Is she with University Hospitals? 1 Q. 2 Α. Well, she's at Southwest Hospital. 3 Okay. Just focusing on University Q. 4 Hospitals, have you had any problems with any of 5 the doctors that you've seen over the years? No problem. 6 Α. No. Have you had any problems with any of the 7 0. nurses at University Hospitals over the years? 8 9 No. Everything has been -- there hasn't 10 been any problems with anything, and I've been 11 able to understand. 12 They've been able to communicate with you 0. 13 about the diagnosis and the care? 14 Α. Well, before, though, there was no 15 interpreter, and I would have to write -- write 16 notes. 17 Ο. Were you able to write the notes and get 18 the information from the doctors? 19 Α. Yes. 20 Do you have interpreters now, or do you Ο. 21 still write notes when you go to see your heart 22 doctor? 23 At first -- at first I was having to Α. 24 write notes, but then later an interpreter was 25 provided.

_	Page 14
1	Q. Did you have an interpreter yesterday
2	when you visited your heart doctor?
3	A. Yes.
4	Q. Do you know who provided the interpreter?
5	A. From Parma, I don't remember the name
6	boy, I can't think of the name. He's a young
7	person, about
8	THE INTERPRETER: The interpreter is
9	asking for clarification.
10	A. A 19-year-old interpreter, and that
11	interpreter was good.
12	Q. Did UH provide the interpreter, or did
13	you bring the interpreter?
14	A. They did, yeah. I told them, and made
15	them aware, and then they called the interpreter.
16	Q. Do you remember the last time you went to
17	University Hospitals when they didn't call an
18	interpreter for you?
19	A. Before when there was no interpreter; is
20	that what you mean?
21	Q. Yes.
22	A. When there was no interpreter called,
23	maybe five years ago, I think. I forget now. Six
24	years ago? Before, there was consistently no
25	interpreters provided.

	John Horan on 03/03/2020
1	Q. In the last at least two or three years
2	you've had interpreters every time you've visited
3	UH?
4	A. Yes.
5	Q. And you're asking for the interpreters?
6	A. I told them to get an interpreter.
7	Q. Meaning the doctors that you go see?
8	A. Yes. Yes, I would. Sometimes if I have
9	an appointment, I would tell them that I needed an
10	interpreter.
11	Q. And
12	A. I don't know why my hand is wet.
13	Q. I want to take you to the times when you
14	visited UH, and you didn't have an interpreter.
15	A. Yes.
16	Q. Did you communicate by reading lips and
17	writing notes?
18	A. Writing notes.
19	Q. And were you able to understand what the
20	doctor was doing for you?
21	A. Well, the thing is, the doctor would come
22	in, and it was real short, you know, real
23	simplified, and that was it.
24	Q. Were you able to write the notes and ask
25	questions?

	Daws 46	
1	Page 16 A. Yes. I was able to.	
2	Q. Did the doctor write notes back to you?	
3	A. Yes.	
4	Q. Were the doctors trying to be helpful?	
5	A. They were they were helpful. Tim	
6	Gallagher, as I said, I went I saw him for 20	
7	years. He would we would write notes, and we	
8	would gesture. He was good.	
9	Q. Why did you file this lawsuit?	
10	A. Because they refused to provide an	
11	interpreter when I was in the hospital.	
12	Q. Anything else? Any other reason?	
13	A. No. It was just it was the one in	
14	Parma.	
15	Q. What were you in the hospital for?	
16	A. I went to the emergency room. Oh, I had	
17	a real bad cough, and I had shortness of breath,	
18	and I just was, like, in a coma.	
19	Q. What do you remember from the visit?	
20	A. I was so ill that it was almost like I	
21	was in a coma. And it was they found out that	
22	I had CHF.	
23	Q. Who was with you, your wife?	
24	A. My wife, yes.	
25	Q. Did your son, or one of your sons, or	

1	Page 17 both of your sons come?
2	
	A. I think, yes. I think yes.
3	Q. Which one, or both?
4	A. John II.
5	Q. Was he there the whole time?
6	A. Yeah. He was able to sign.
7	Q. Was he with you the whole time when you
8	were in the hospital?
9	THE INTERPRETER: The interpreter is
10	asking for the patient to wait until I'm finished
11	signing the question.
12	A. I think we were there all together, so
13	he yes. The answer to that question would be
14	yes.
15	Q. And was he able to communicate with the
16	doctors?
17	A. Yes.
18	Q. He can sign?
19	A. Yes. He signs, yes. Of course.
20	Q. Now, on that visit, did an interpreter
21	come after John and a patient advocate requested
22	one?
23	MR. NOVEMBER: Let's take a break for a
24	second so you can clean your arm up. Is that
25	okay?

	Page 18
1	MR. CAMPBELL: That's fine.
2	(Recess had.)
3	MR. CAMPBELL: Back on the record.
4	Q. You were telling me about when you went
5	in for the cough to the Parma Hospital when we
6	broke.
7	A. Yes.
8	Q. Do you recall whether an interpreter came
9	in at any point during your stay that occasion?
10	A. No. No. I don't believe so.
11	Q. Was your son, John, living in Cleveland
12	during 2018?
13	A. He was living with us in Parma, yes.
14	Q. Was he going to your
15	A. He lived in Cleveland, and then he moved
16	to Parma.
17	Q. Was he going to your doctor visits during
18	2018 with you?
19	A. Yes.
20	Q. Are there any other visits that you
21	recall that you have an issue with University
22	Hospitals?
23	A. No. No. Just all just those years,
24	years ago, as I said, there was no interpreter.
25	But I did have surgery on my hip nine times, and I

Page 19 never had an interpreter for those surgeries.

- Q. On the times when you didn't have an interpreter, did you communicate either through your son or through writing?
 - A. Writing. Just writing.
- Q. Did you ever have an appointment at University Hospitals where you left not knowing what care you received?
- A. No. As I said, I just kind of went with it, and in the past there were no interpreters provided, even though I would still go.
- Q. And it seems like you've lived your life being able to communicate with people either through gestures or writing?
- 15 A. Yes.

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- Q. What do you want from this lawsuit?
- A. Well, I want an interpreter to be
- 18 | provided, because it's -- I've been refused.
- Q. And UH has been providing interpreters for the last several years, correct?
- A. Yes. After -- after a time, yes. I
 don't remember dates. I forget the dates. My
 wife, she's -- she would know.
- Q. On the occasion when you went and there wasn't an interpreter at UH, were the medical

Page 20 professionals trying to communicate with you to 1 2 the best of their abilities? 3 Well, they would try to write --Α. MR. NOVEMBER: Dave, can we go off the 4 5 record so I can talk to you for just a moment? (Discussion off the record.) 6 MR. CAMPBELL: Back on the record. This 7 will be -- you tell me -- we're going to stop the 8 9 deposition for today. We'll come back at some 10 point later in March to conclude the deposition 11 and address the issues. We understand he's having 12 a bad day, Mr. Horan, so we're going to come back, 13 and hopefully he's feeling better and able to communicate -- not communicate -- recollect better 14 15 later in March. So we'll come back in. Today 16 we're just closing. Is that fair? MR. NOVEMBER: 17 That's fair. 18 MR. CAMPBELL: Okay. Then we'll come 19 back. Why don't we break until -- so today we'll 20 Thank you, Mr. Horan, for coming today. stop. 21 And I quess I would say if we have to come back 22 with him, if he's not feeling well and needs to go 23 home, you decide between now and 10:30 whether the 24 three of them need to leave, and we all come back, 25 or what you do.

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Page 21
               MR. NOVEMBER: Antoinette is fine.
 1
                                                     She's
 2
            And he can sit with John, Jr. Out there.
 3
               MR. CAMPBELL: Okay. So we're just
 4
     closing, but we're not -- the deposition is not
     ended.
 5
 6
               (The deposition was continued at 9:46
     a.m.)
 7
 8
                         SIGNATURE:
 9
     It was agreed by and between counsel and the
10
     parties that the Deponent will read and sign the
11
     transcript of said deposition.
12
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```

1	Page 22 CERTIFICATE
2	The State of Ohio,)
3	ss:
4	County of Cuyahoga.)
5 6 7 8 9 10	I, Todd L. Persson, a Notary Public within and for the State of Ohio, duly commissioned and qualified, do hereby certify that the within named witness, JOHN HORAN, was by me first duly sworn to testify the truth, the whole truth and nothing but the truth in the cause aforesaid; that the testimony then given by the above-referenced witness was by me reduced to stenotypy in the presence of said witness; afterwards transcribed, and that the foregoing is a true and correct transcription of the testimony so given by the above-referenced witness. I do further certify that this deposition
12 13 14 15	was taken at the time and place in the foregoing caption specified and was completed without adjournment. I do further certify that I am not a relative, counsel or attorney for either party, or otherwise interested in the event of this action. IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office at Cleveland, Ohio, on this 25th day of June, 2020.
17 18 19 21	Todd I Person
22	Todd L. Persson, Notary Public within and for the State of Ohio
23 24	My commission expires August 1, 2020.
25	

1	SIGNATURE P.	Page 23 AGE
2		l. vs. UNIVERSITY SYSTEM, INC., et
3		SISIEM, INC., CC
4		18-CV-02054 HN HORAN
5	_	RCH 5, 2020
6	To the Reporter:	
7	I have read the entire tran- taken in the captioned matte	
8		the following changes
9	indicated. I have signed my Sheet and the appropriate Co	
10	authorize you to attach bot transcript.	n to the original
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